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ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 JOHNNY TROTTER, II, M.D.,
D-2 ANDREW HARDY, JR., M.D.,
D-3 ELAINE LOVETT, and
D-4 MICHELLE FREEMAN,

Defendants.

Case:2:14-cr-20273
Judge: Steeh, George Caram
MJ: Grand, David R.
Filed: 05-08-2014 At 04:13 PM
SEALED MATTER (LG)

**GOVERNMENT'S MOTION AND SUPPORTING BRIEF
TO SEAL INDICTMENT AND ARREST WARRANTS**

The United States of America hereby moves for an order sealing the indictment and arrest warrants in this case and states:

1. The indictment in this case charges the defendants with one or more federal crimes.
2. Rule 6(e)(4) of the Federal Rules of Criminal Procedure provides:

(4) Sealed Indictment. The magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is in custody or has been released pending trial. The clerk must then seal the indictment, and no person may disclose the indictment's existence except as necessary to issue or execute a warrant or summons.

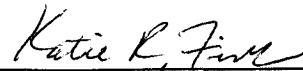
Fed.R.Crim.P. 6(e)(4).

3. The government requests that the indictment and arrest warrants be sealed because it is concerned that the defendants may attempt to flee, destroy evidence, or intimidate witnesses if the indictment and arrest warrants become a matter of public record before the defendants are arrested.

WHEREFORE, the government requests this Court to issue an order sealing the indictment and arrest warrants.

Respectfully submitted,

Barbara L. McQuade
United States Attorney



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Dated: May 8, 2014

IT IS SO ORDERED.

Entered: 5/8/14



Honorable David R. Grand
United States Magistrate Judge